

April 8, 2022

VIA U.S. MAIL AND E-MAIL

Jelani Shareem, Enforcement Officer (via U.S. Mail and E-Mail) U.S. Environmental Protection Agency Region IX – Enforcement Division 75 Hawthorne Street (ENF-3-3) San Francisco, CA 94105

Kimberly Wells, Attorney Advisor (via U.S. Mail and E-Mail) U.S. Environmental Protection Agency Region IX – Office of Regional Counsel 75 Hawthorne Street (ORC-2-3) San Francisco, CA 94105

Re: In the Matter of: Kamehameha Schools

EPA Docket No.: UIC-009-2018-0008

Phase I (O'ahu) Large Capacity Cesspool ("LCC") Closures and Schedule

Dear Mr. Shareem and Ms. Wells:

I am Director of Asset Management of Community & 'Āina Resiliency of the Trustees of the Estate of Bernice Pauahi Bishop d/b/a Kamehameha Schools ("KS").

Pursuant to Paragraph 48.a of the Consent Agreement and Final Order in the Matter of: Kamehameha Schools, EPA Docket No: UIC-009-2018-0008 ("CA/FO") and the Environmental Protection Agency's ("EPA") January 6, 2022 letter granting KS's request for an extension, below please find KS's plan and schedule for closure of the nineteen (19) LCCs identified in Phase I (O'ahu) of this audit:¹

¹ The Auditor's Inspection Phase Completion Report for Phase I (Oʻahu) was previously submitted to the EPA on April 7, 2022, pursuant to Paragraph 47 of the CA/FO and the EPA's January 6, 2022 letter granting KS's request for an extension.

567 South King Street, Honolulu, Hawai'i 96813-3036 Telephone (808) 523-6200 Founded and Endowed by the Legacy of Princess Bernice Pauahi Bishop

No.	TMK	SITE ADDRESS	PLAN	SCHEDULE
1			KS in discussions with	KS in discussions with
			tenant.	tenant.
2			Final LCC Closure	Final LCC Closure Report
			Report dated July 8,	dated July 8, 2019 was
			2019 was submitted to	submitted to EPA by
		↓	EPA by Auditor	Auditor.
3	Ex. 6 Personal Privacy (PP)	Ex. 6 Personal Privacy (PP)	Final LCC Closure	Final LCC Closure Report
			Report dated	dated November 27, 2019
			November 27, 2019	was submitted to EPA by
			was submitted to EPA	Auditor.
		-	by Auditor.	/ret 1
4			LCC to be abandoned,	Tenant's engineer has
			back-filled and closed	prepared plans.
	[(CCC C - 2 : 1	by Tenant.	A . 1'
		(SCC for 2 single		Application for IWS permit
		family homes; Onsite IWS for		to be submitted to HDOH.
		Banazi Sushi		Installation of IWS to
		Restaurant; LCC for		commence as soon as
		1 single-family home		possible following HDOH
		used for inventory		grant of IWS permit (subject
		and equipment		to Section G of the CA/FO).
		storage)		
				LCC to be closed as soon as
				possible following
				installation of the IWS
				(subject to Section G of the
				CA/FO).

No.	TMK	SITE ADDRESS	PLAN	SCHEDULE
5			KS to close LCC.	Application for IWS permit
				to be submitted to HDOH
			KS' engineer inspected	on or before May 6, 2022.
			property to establish	
			existing design	Installation of IWS to
			conditions and	commence as soon as
			restrictions.	possible following HDOH
	Ex. 6 Personal Privacy (PP)			grant of IWS permit (subject
	Lx. 0 reisonal riivacy (FF)	Ex. 6 Personal Privacy (PP)		to Section G of the CA/FO).
		Ex. or ersonarr rivacy (i i)		
				LCC to be closed as soon as possible following
				installation of the IWS
				(subject to Section G of the
				CA/FO).
6			KS to close LCC.	Application for IWS permit
	L			to be submitted to HDOH
			KS' engineer inspected	on or before May 6, 2022.
		L	property to establish	
			existing design	Installation of IWS to
			conditions and	commence as soon as
			restrictions.	possible following HDOH
				grant of IWS permit (subject
				to Section G of the CA/FO).
				LCC to be closed as soon as
				possible following
				installation of the IWS
				(subject to Section G of the
				CA/FO).

No.	TMK	SITE ADDRESS	PLAN	SCHEDULE
7			Tenant to close LCC and replace with 1000 gallon Septic Tank manufactured by	Application for IWS permit to be submitted to HDOH on or before May 6, 2022.
			Orenco Systems, Inc.	Installation of IWS to commence as soon as possible following HDOH grant of IWS permit (subject to Section G of the CA/FO).
	Ex. 6 Personal Privacy (PP)	Ex. 6 Personal Privacy (PP)		LCC to be closed as soon as possible following installation of the IWS (subject to Section G of the CA/FO).
8			Final LCC Closure Report dated May 17, 2019 was submitted to EPA by Auditor.	Final LCC Closure Report dated May 17, 2019 was submitted to EPA by Auditor.
9			KS to close LCC. KS' engineer inspected property to establish existing design conditions and restrictions.	Application for IWS permit to be submitted to HDOH on or before May 6, 2022. Installation of IWS to commence as soon as possible following HDOH grant of IWS permit (subject to Section G of the CA/FO).
				LCC to be closed as soon as possible following installation of the IWS (subject to Section G of the CA/FO).

No.	ТМК	SITE ADDRESS	PLAN	SCHEDULE
10			KS to close LCC.	Application for IWS permit
				to be submitted to HDOH
			KS' engineer to inspect	as soon after plans are
			property for existing	prepared.
			design conditions and restrictions.	Installation of IWS to
			restrictions.	commence as soon as
				possible following HDOH
				grant of IWS permit (subject
				to Section G of the CA/FO).
				LCC to be closed as soon as
				possible following
				installation of the IWS
				(subject to Section G of the
11			KS in discussions with	CA/FO). KS in discussions with
11			tenant.	tenant.
	Ex. 6 Personal Privacy (PP)		ciraire.	terrarie.
12		Ex. 6 Personal Privacy (PP)	Tenant to close LCC.	Application for IWS permit
			Tenant has retained	to be submitted to HDOH
			engineer to prepare	as soon after plans are
			septic plans.	prepared.
				Installation of IWS to
				commence as soon as
				possible following HDOH
				grant of IWS permit (subject
				to Section G of the CA/FO).
				LCC to be closed as soon as
				possible following
				installation of the IWS
				(subject to Section G of the CA/FO).
13			KS in discussions with	KS in discussions with
			tenant.	tenant.

No.	ТМК	SITE ADDRESS	PLAN	SCHEDULE
14			KS to close LCC.	Application for IWS permit
				to be submitted to HDOH
			KS' engineer to inspect	as soon after plans are
			property for existing	prepared.
			design conditions and	T 11 : CTIVE
			restrictions.	Installation of IWS to
				commence as soon as
				possible following HDOH grant of IWS permit (subject
	Ex. 6 Personal Privacy (PP)			to Section G of the CA/FO).
		Ex. 6 Personal Privacy (PP)		to seed on the Gay 10).
				LCC to be closed as soon as
				possible following
				installation of the IWS
				(subject to Section G of the
				CA/FO).
15			KS to close LCC.	Application for IWS permit
	\			to be submitted to HDOH
			KS' engineer to inspect	as soon after plans are
			property for existing	prepared.
			design conditions and restrictions.	Installation of IWS to
			restrictions.	commence as soon as
				possible following HDOH
				grant of IWS permit (subject
				to Section G of the CA/FO).
				, ,
				LCC to be closed as soon as
				possible following
				installation of the IWS
				(subject to Section G of the
				CA/FO).

No.	TMK	SITE ADDRESS	PLAN	SCHEDULE
16			Tenant to close LCC and retain engineer and contractor for closure.	Application for IWS permit to be submitted to HDOH as soon after plans are prepared.
	Ex. 6 Personal Privacy (PP)	Ex. 6 Personal Privacy (PP)		Installation of IWS to commence as soon as possible following HDOH grant of IWS permit (subject to Section G of the CA/FO).
				LCC to be closed as soon as possible following installation of the IWS (subject to Section G of the CA/FO).
17			Tenant to close LCC. and retain engineer and contractor for closure.	Application for IWS permit to be submitted to HDOH as soon after plans are prepared.
				Installation of IWS to commence as soon as possible following HDOH grant of IWS permit (subject to Section G of the CA/FO).
				LCC to be closed as soon as possible following installation of the IWS (subject to Section G of the CA/FO).

No.	TMK	SITE ADDRESS	PLAN	SCHEDULE
18			KS to close LCC.	Application for IWS permit
				to be submitted to HDOH
			KS' engineer to inspect	as soon after plans are
			property for existing	prepared.
			design conditions and	
			restrictions.	Installation of IWS to
				commence as soon as
				possible following HDOH grant of IWS permit (subject
	Ex. 6 Personal Privacy (PP)			to Section G of the CA/FO).
		Ex. 6 Personal Privacy (PP)		to seed on the Gay 1 O).
				LCC to be closed as soon as
				possible following
				installation of the IWS
				(subject to Section G of the
		↓		CA/FO).
19			KS to close LCC.	Application for IWS permit
	L			to be submitted to HDOH
			KS' engineer to inspect	as soon after plans are
			property for existing	prepared.
			design conditions and restrictions.	Installation of IWS to
			restrictions.	commence as soon as
				possible following HDOH
				grant of IWS permit (subject
				to Section G of the CA/FO).
				,
				LCC to be closed as soon as
				possible following
				installation of the IWS
				(subject to Section G of the
				CA/FO).

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Very truly yours,

Marina Harman

Marissa Harman

Director, Asset Management

Community & 'Āina Resiliency Group

Trustees of the Estate of Bernice Pauahi Bishop

d/b/a Kamehameha Schools